IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MICHAEL A. REHFELDT ex rel. UNITED	§	
STATES OF AMERICA AND THE STATE	§	
OF TEXAS,	§	
	§	Civil Case No. 3-09-CV-0203-B
Plaintiff,	§	
	§	
v.	§	
	§	
VITAS HEALTHCARE CORPORATION,	§	
VITAS INNOVATIVE HOSPICE CARE OF	§	
SAN ANTONIO, LP, WELLMED MEDICAL	§	
MANACEMENT CARE I EVEL	Š	

SAN ANTONIO, LP, WELLMED MEDICAL MANAGEMENT, CARE LEVEL MANAGEMENT, LLC, INSPIRIS, INC., INSPIRIS HOSPICE, LLC, JUSTO CISNEROS AND KEITH BECKER,

Defendants.

DEFENDANTS INSPIRIS, INC., INSPIRIS HOSPICE, AND WELLMED'S MOTION TO EXCEED PAGE LIMITS

Defendants Inspiris, Inc., Inspiris Hospice, LLC, and WellMed Medical Management (collectively the "Movants") file this motion to exceed the page limit imposed by Local Rule 7.2, which limits the length of motions to twenty-five (25) pages. Specifically, Movants' make such request as to their Motion to Dismiss (Dckt. #44), which was filed on March 1, 2012.

Movants' Motion to Dismiss is thirty-three (33) pages long. They ask for leave to exceed the page limit by eight (8) pages for several reasons. First, rather than file three separate motions of up to twenty-five pages each (one motion for each Movant), Movants have consolidated their arguments into a single motion. They have done so for the convenience of the Court and the parties. Second, the Motion to Dismiss seeks the complete dismissal of a thirty-five (35) page, six-count *qui tam* complaint against these defendants. Thus, the extra pages are necessary for completeness in addressing Movants' various grounds for dismissal.

Accordingly, Movants respectfully request that the Court enter an order allowing them to exceed the twenty-five page limit with respect to their Motion to Dismiss, all as set forth above.

Dated: March 2, 2012 Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ Victor C. Johnson

William Mateja Texas Bar No. 13185350 Victor C. Johnson Texas Bar No. 24029640

1717 Main Street, Suite 5000 Dallas, TX 75201 (214) 747-5070 (telephone) (214) 747-2091 (telecopy)

Counsel for Defendants Inspiris, Inc., Inspiris Hospice, LLC, and WellMed Medical Management

CERTIFICATE OF CONFERENCE

I certify that I attempted to confer with Henry Frohsin and J. Elliott Walthall, both of Frohsin & Barger, LLC, by telephone on March 2, 2012. I left detailed messages with both Messrs. Frohsin and Walthall regarding the substance of this motion, but neither counsel returned my calls. Accordingly, I cannot represent to the Court whether counsel opposes or does not oppose the Motion to Exceed Page Limits.

/s/ Victor C. Johnson

Victor C. Johnson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served upon all counsel of record on March 2, 2012:

/s/ Victor C. Johnson

Victor C. Johnson